IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Sean Murtaugh :

v. : Civil Action No. 2:24-cv-00026-JFM

Robert S. Goggin, III, Esquire, Goggin &: Duckworth, P.C., Forceno Goggin & Keller, P.C.: Keller and Goggin, P.C., Jordan Litigation:

Funding, LLC, Norris Jordan

ANSWER OF DEFENDANTS, ROBERT S. GOGGIN, III, ESQUIRE, GOGGIN & DUCKWORTH, P.C., FORCENO GOGGIN & KELLER, P.C., AND KELLER & GOGGIN, P.C., TO NEW MATTER CROSSCLAIM OF DEFENDANTS, JORDAN LITIGATION FUNDING, LLC, AND NORRIS JORDAN

Defendants, Robert S. Goggin, III, Esquire, Goggin & Duckworth, P.C., Forceno Goggin & Keller, P.C., and Keller & Goggin, P.C. ("answering defendants"), by and through their attorneys Marshall Dennehey, P.C., hereby answer the New Mater Crossclaim of Jordan Litigation Funding, LLC and Norris Jordan (collectively "Jordan Defendants"), and aver in support thereof:

<u>Count I – Common Law Contribution and/or Indemnification</u> <u>Against Goggin Parties</u>

- 1. Paragraph 1 is an incorporation paragraph to which no response is required.
- 2. Paragraph 2 is an incorporation paragraph to which no response is required. To the extent a response is required, please see answering defendants' Answer with New Matter to Plaintiff's Amended Complaint.

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- 3. The averments of this paragraph include conclusions of law to which no response is required. It is specifically denied that answering defendants are alone or solely liable to plaintiff for any of plaintiff's alleged claims or damages, or liable jointly and severally with any defendant in any way whatsoever. It is further denied that any recovery of plaintiff must come in whole or in part from answering defendants. Plaintiff was not injured by actionable conduct on the part of answering defendants.
- 4. The averments of this paragraph include conclusions of law to which no response is required. To the extent a response is required, it is denied that answering defendants are liable to any defendant for contribution, indemnification, and/or by appointment in any way whatsoever. It is further denied that any recovery of plaintiff must come in whole or in part from answering defendants. Plaintiff was not injured by actionable conduct on the part of answering defendants. Plaintiff has not stated a basis for recovery against the Jordan Defendants.
- 5. The averments of this paragraph include conclusions of law to which no response is required. There was no scheme to defraud. It is denied that plaintiff experienced any damage as the result of actionable conduct on the part of answering defendants. Plaintiff has not stated a basis for recovery against the Jordan Defendants.

(continued on next page)

WHEREFORE, Robert S. Goggin, III, Esquire, Goggin & Duckworth, P.C., Forceno Goggin & Keller, P.C., and Keller & Goggin, P.C. demand judgment in their favor and against all other parties, and dismissal of plaintiff's claims and all codefendants' crossclaims, with prejudice, together with interest, costs and attorney's fees as authorized by law.

Respectfully submitted,

MARSHALL DENNEHEY, P.C.

BY:

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Keller & Goggin, P.C.

Dated: May 5, 2025

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Funding, LLC, Norris Jordan :

CERTIFICATE OF SERVICE

I, Josh J.T. Byrne, Esquire, do hereby certify that a true and correct copy of the Answer of Defendants Robert S. Goggin, III, Esquire, Goggin & Duckworth, P.C., Forceno Goggin & Keller, P.C., and Keller & Goggin, P.C. to the New Mater Crossclaim of Jordan Litigation Funding, LLC and Norris Jordan, was electronically filed with the Court on the date below and is available for viewing and downloading from the ECF System.

MARSHALL DENNEHEY, P.C.

BY:

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Date: May 5, 2025